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DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

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December 31, 2018

IN REPLY PLEASE

REFER TO FILE: **SWQ-4**

Ms. Renee Purdy
Acting Executive Officer
California Regional Water Quality
Control Board – Los Angeles Region
320 West Fourth Street, Suite 200
Los Angeles, CA 90013

Attention Mr. Ivar Ridgeway

Dear Ms. Purdy:

MODIFICATION OF SAMPLING METHOD FOR TMDL RECEIVING WATER SITE UPPER SAN GABRIEL RIVER COORDINATED INTEGRATED MONITORING PROGRAM

The Upper San Gabriel River Watershed Management Group, consisting of the County of Los Angeles, Los Angeles County Flood Control District, and the Cities of Baldwin Park, Covina, Glendora, Industry, La Puente, South El Monte, and West Covina, are submitting a proposed modification to the sampling method of Total Maximum Daily Load (TMDL) receiving water site USGR_R4_RAM located on San Gabriel River Reach 4.

In accordance with the Upper San Gabriel River Coordinated Integrated Monitoring Program (CIMP), as approved by the Los Angeles Regional Water Quality Control Board on November 13, 2015, installation of autosamplers at TMDL receiving water sites, including USGR_R4_RAM, was scheduled to commence in Fiscal Year 2015-16 (see enclosed Attachment B for location map of monitoring site USGR_R4_RAM). Because the monitoring location was within the U.S. Army Corps of Engineers' (Corps) Operation and Maintenance jurisdiction, the installation required a Corps Section 408 permit. The application for the Corps Section 408 permit was submitted in June 2015 and the permit was received from the Corps in January 2018. Since October 2015 the monitoring procedure at USGR_R4_RAM was conducted in accordance with the visual observations and grab methods specified in Section 9.1 of the USGR CIMP. No flow has been observed at the site since monitoring commenced in October 2015 and no samples have been collected. The proposed CIMP modification is to remove the requirement for

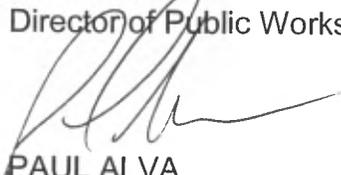
Ms. Renee Purdy
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sampling by autosampler at USGR_R4_RAM and designate the current procedure of visual observations and grab sampling as the permanent procedure.

The proposed modification affects CIMP Section 9.1, Section 12, Table 12-1, and Attachment B (see Enclosure for exact revised pages of the CIMP in track changes).

If you have any questions, please contact me at (626) 458-4325 or PALVA@dpw.lacounty.gov or your staff may contact Mr. Mark Lombos at (626) 458-7143 or MLOMBOS@dpw.lacounty.gov.

Very truly yours,
MARK PESTRELLA
Director of Public Works



PAUL ALVA
Assistant Deputy Director
Stormwater Quality Division

IT:eg

P:\swqpubl\Secl2018\Ltr\20181206 Draft USGR CIMP mod request

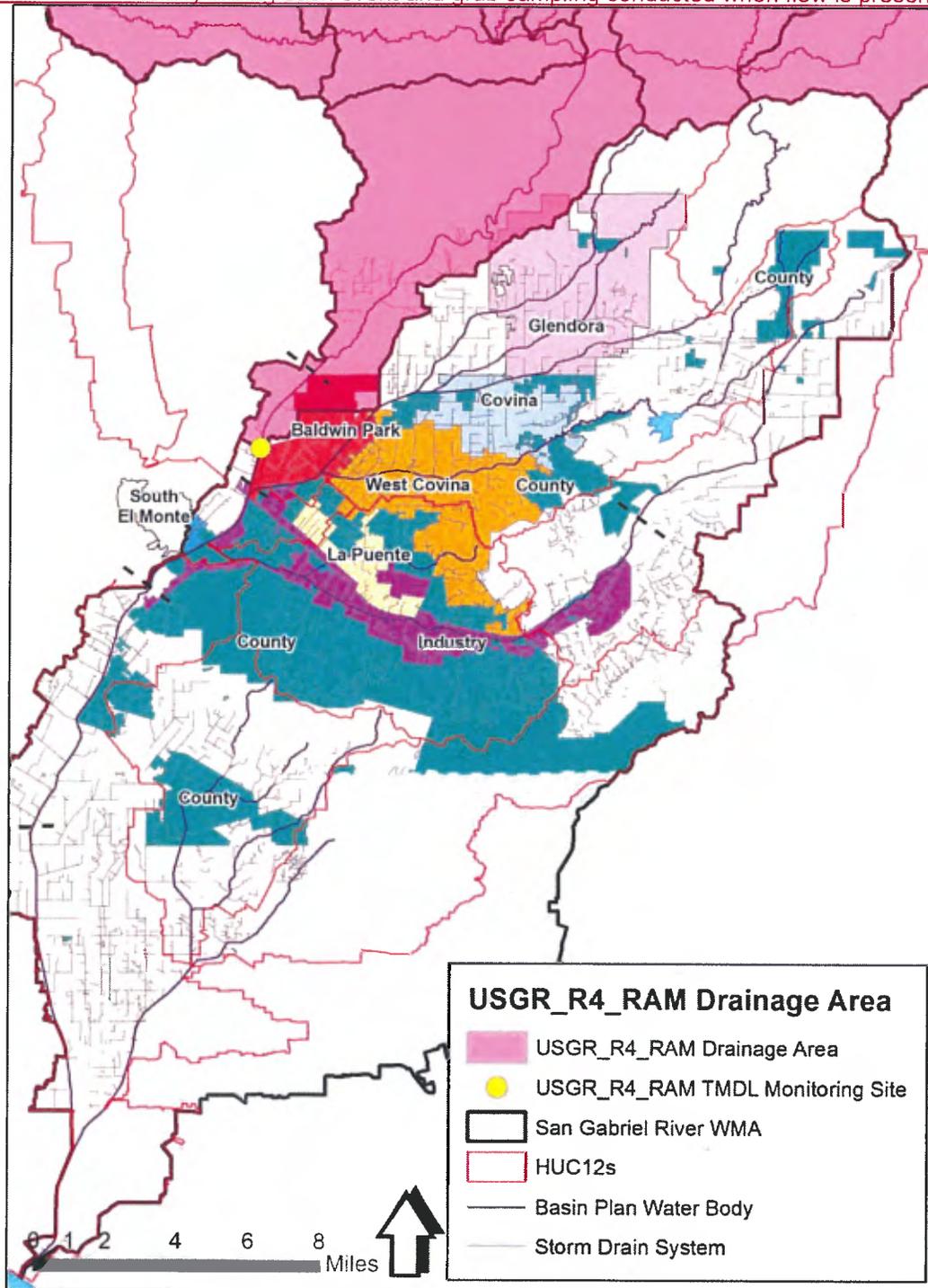
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cc: City of Baldwin Park
City of Covina
City of Glendora
City of Industry
City of La Puente
City of South El Monte
City of West Covina
Los Angeles County Flood Control District

B-1.3 San Gabriel River Reach 4 TMDL Site

Waterbody Name	Waterbody Type	Site ID	Historical Site ID	Site Type	Latitude	Longitude
SGR Reach 4	Main Stem	USGR_R4_RAM	N/A	TMDL	34.07296	-118.00200

General Description: TMDL monitoring site located in San Gabriel River Reach 4 at control structure just downstream from Ramona Boulevard. An autosampler will not be installed due to no observation of flow. The site will be observed visually during each event and grab sampling conducted when flow is present.



9 Monitoring Procedures

A general outline of the monitoring procedures is presented in this section. Detailed discussion of the procedures is included in **Attachment C**.

9.1 MONITORING PROCEDURES

Monitoring will occur during dry and wet conditions. The period of record from USGS 11085000 flow gage measuring discharge from the Santa Fe Dam contains approximately 60% of years there with zero discharge from the dam, due to the capacity available in Santa Fe Dam, two upstream dams, and the rapid infiltration rate of the riverbed. The SGR Metals TMDL specifies San Gabriel River wet conditions when flow is measured at 260 cfs or greater from the gage. The rationale in the TMDL for specifying 260 cfs is the upper portion of the watershed would be hydrologically connected to the lower portion. Because there are years with zero discharge, defining wet weather conditions using the measured flowrate is problematic. Rather, the definitions for wet and dry weather for the USGR CIMP is as follows:

Wet weather condition for triggering storm events will be defined as a 70% probable forecast of greater than 0.25 inches of precipitation of rain where the preceding 72 hours were dry weather with less than 0.1 inches of rain. To qualify the event as wet weather, the receiving water flow would need to be measured greater than 20% over the base flow.

Dry weather is defined in the MRP as when the flow of the receiving water body is less than 20 percent greater than the base flow or, in the case of an estuary, on days with less than 0.1 inch of rain and those days not less than three days after a rain event of 0.1 inch or greater within the watershed, as measured from at least 50 percent of Los Angeles County Department of Public Works (LACDPW) controlled rain gauges within the watershed.

Note that if rainfall begins after dry weather monitoring has been initiated, then dry weather monitoring will be suspended and continued on a subsequent day when weather conditions meet the dry weather conditions. Generally, grab samples will be collected during dry weather and composite samples will be collected during wet weather. Grab samples will be used for dry weather sampling events as the composition of the receiving water will change less over time; and thus, the grab samples sufficiently characterize the receiving water. Additionally, grab samples for dry weather are consistent with similar programs throughout the region.

However, composite samples will be used for wet weather sampling events to sufficiently characterize the receiving water during wet weather. Grab samples may be utilized to collect wet weather sampling in certain situations, which may include, but are not limited to, when the constituent of interest requires the use of grab samples (e.g., *E. coli*; oil and grease), conditions are considered unsafe to collect composite samples, or to perform investigative monitoring where composite sampling or installation of an automatic sample compositor (autosampler) may not be warranted. Usually, autosamplers are used to capture the storm. The program will target the first 24 hours of the storm water discharge or for the entire storm water discharge if it is less than 24 hours. Additionally, if autosamplers fail during a rain event, or if the rain event is such that composite samples cannot be collected (e.g., very short in duration or volume), grab samples will be collected ~~will be collected~~ every 20 minutes for 3 hours or the duration of the storm, if it is less

than 3 hours, and submitted for analysis for all analytes. For those events and sites where aquatic toxicity testing is required, grab volumes will be adjusted such that enough water is collected to perform the required analyses. (Reference: EPA NPDES Storm Water Sampling Guidance Document EPA 833-B-92-001, 40 CFR 122.21 (g)(7)(ii).)

USGR R4 RAM will have an exception for the installation of an autosampler. No flow has been observed at the site since monitoring commenced in October 2015. The permanent monitoring procedure will be visual observations and grab sampling. If flow is present, grab samples will be collected every 20 minutes for 3 hours or the duration of the storm, if it is less than 3 hours, and submitted for analysis for all analytes.

For dry weather toxicity monitoring, the sampling event must take place during the historically driest month. A review of the long-term precipitation record results in July being the driest month, on average. As a result, the dry weather monitoring event that includes toxicity monitoring will be conducted in July. The second dry weather monitoring event will take place during January unless sampling during another month is deemed to be necessary or preferable.

All reasonable efforts will be made to monitor the first significant rain event of the storm year (first flush). The targeted storm events for wet weather sampling will be selected based on a reasonable probability that the events will result in substantially increased flows in the San Gabriel River over at least 12 hours. Sufficient precipitation is needed to produce runoff and increase flow. The decision to sample a storm event will be made in consultation with weather forecasting information services after a quantitative precipitation forecast has been determined. All efforts will be made to collect wet weather samples from all sites during a single targeted storm event. Because a significant storm event is based on predicted rainfall, it is recognized that this monitoring may be triggered without 0.25 inches of rainfall actually occurring. In this case, the monitoring event will still qualify as meeting this requirement provided that sufficient sample volume is collected to do all required laboratory analysis. Documentation will be provided showing the predicted rainfall amount as part of the event summary in the annual report. However, safety or other factors may make it infeasible to collect some or all samples from a given storm event. For example, storm events that will require field crews to collect wet weather samples during holidays and/or weekends may not be sampled due to sample collection or laboratory staffing constraints.

Additional information to support evaluating weather conditions, collecting grab and composite samples, and targeting wet weather sampling events is provided in **Attachment C**.

9.2 ADAPTIVE MONITORING TRIGGERS

Monitoring of a specific constituent will be considered for elimination if:

- For a WBPC covered in a TMDL, no exceedances are observed over a five-year period.
- For a WBPC on the 303(d) list, data collected are sufficient to support delisting per State policy.
- WBPC being monitored due to downstream 303(d) listings, two years of monitoring of no exceedances are observed for the same condition as the listing (i.e., wet or dry weather).
- Category 3C WBPCs having no exceedances over two years.

12 Schedule for CIMP Implementation

Existing monitoring at LACFCD mass emission sites will continue to be conducted during the CIMP approval process. Beginning summer 2014, the dry weather screening of major outfalls will commence. Implementation of new monitoring programs and modifications to existing monitoring will commence on July 1, 2015 or 90 days after approval by the Executive Officer of the Regional Board, whichever is later.

The EWMP Group intends to phase in the receiving water and stormwater outfall elements of this CIMP to accommodate multiple agency coordination and permitting as well as processes for acquiring and installing autosamplers. Numerous autosampler stations have been installed throughout the County and provide significant experience in understanding the challenges and timelines for designing, permitting, and installing autosampler stations. The following provides an overview of the tasks and timelines associated with autosampler installation and what would be considered a relatively straightforward installation timeframe:

- Detailed autosampler site configuration/design, which includes data collection and review, identification of permit requirements, concept design, development of summary technical memos, and review by participating agencies and associated divisions: 12 months
- Obtaining permits from one or more of the following entities: Army Corps of Engineers, LACFCD, United States Fish and Wildlife Service, California Department of Fish and Game, California Coastal Commission, and the Regional Board: 3 to 10 months
- Purchase of equipment via contractor or via agency procurement process (can occur somewhat concurrently with permitting): 2 to 6 months
- Connecting to power via an upgrade to existing service or establishing new service: 1 to 6 months
- Construction of monitoring station assuming no bid/award process: 1 month
- Total time: 18 to 30 months

Phase I of the CIMP Implementation:

- Fiscal Year 14-15
- Non-stormwater screening
- Determination of significant non-stormwater outfalls
- Continued monitoring at the existing receiving water LTA site (S14)

Phase II of the CIMP Implementation (beginning July 1, 2015 or 90 days after CIMP approval; whichever is later):

- Fiscal Year 15-16
- Continued implementation of non-stormwater outfall program
- Modifications to monitoring at the existing receiving water LTA site
- Installation and monitoring of ~~3~~ 2 new TMDL receiving water sites ([USGR SJC C-1 and USGR WCW BP](#))
- Monitoring of 1 new TMDL receiving water site at Puddingstone Reservoir

Phase III of the CIMP Implementation:

- Fiscal Year 16-17
- Continued implementation of non-stormwater outfall program
- Continued monitoring at all existing LTA and TMDL receiving water sites
- Installation and monitoring of 3 new stormwater outfall sites

Phase IV of the CIMP Implementation:

- Fiscal Year 17-18
- Continued implementation of non-stormwater outfall program
- Continued monitoring at all existing LTA, TMDL receiving water, and stormwater outfall sites
- Installation and monitoring of 4 new stormwater outfall sites

The below ~~Table 12-1~~ **Table 12-1** summarizes the installation and monitoring schedule for LTA, TMDL receiving water and stormwater outfall sites.

**Table 12-1
Receiving Water and Outfall Phasing**

Site	Installation and Monitoring Schedule	Sampling Frequency Wet/Dry ⁽¹⁾
Receiving Water		
S14	Existing	4/2
San Gabriel River Reach 4	FY15-16⁽²⁾ <u>No Installation⁽²⁾</u>	4/2
Walnut Creek Wash	FY15-16 ⁽²³⁾	4/2
San Jose Creek	FY15-16 ⁽²³⁾	4/2
Puddingstone Reservoir	FY-15-16 ⁽³⁴⁾	Varies ⁽³⁴⁾
Outfall		
County of Los Angeles	FY16-17 ⁽⁴⁵⁾	3/0
Covina	FY16-17 ⁽⁴⁵⁾	3/0
Industry	FY16-17 ⁽⁴⁵⁾	3/0
Baldwin Park	FY17-18 ⁽⁴⁵⁾	3/0
Glendora	FY17-18 ⁽⁴⁵⁾	3/0
La Puente	FY17-18 ⁽⁴⁵⁾	3/0
West Covina	FY17-18 ⁽⁴⁵⁾	3/0

1. The sampling frequency per constituent per receiving water site is detailed in Table 2-1 for receiving water sites and Table 4-9 for outfall sites. Wet weather sampling for metals, TSS, hardness and field parameters will be conducted four times per year, other constituents will be collected three times per year. After the first year, data will be evaluated to determine if reducing monitoring frequency to three wet events per year will provide sufficient data. If three events of wet-weather data can provide sufficient data, the Group will submit a request to the Executive Officer to reduce the sampling frequency.

2. An autosampler will not be installed due to no observation of flow. USGR R4 RAM will be observed visually during each event and grab sampling conducted when flow is present.